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ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China  
company; CHINA INTERNATIONAL  
COMMUNICATIONS CO., LTD., a China  
company; TVB HOLDINGS (USA), INC., a  
California corporation; and DISH  
NETWORK L.L.C., a Colorado corporation,  
Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)  
LIMITED, a Hong Kong company; HUA  
YANG INTERNATIONAL TECHNOLOGY  
LIMITED, a Hong Kong company;  
SHENZHEN GREATVISION NETWORK  
TECHNOLOGY CO. LTD., a China  
company; CLUB TVPAD, INC., a California  
corporation; BENNETT WONG, an  
individual, ASHA MEDIA GROUP INC.  
d/b/a TVPAD.COM, a Florida corporation;  
AMIT BHALLA, an individual;  
NEWTVPAD LTD. COMPANY d/b/a  
NEWTVPAD.COM a/k/a TVPAD USA, a  
Texas corporation; LIANGZHONG ZHOU,  
an individual; HONGHUI CHEN d/b/a E-  
DIGITAL, an individual; JOHN DOE 1 d/b/a  
BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN  
DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;  
JOHN DOE 5 d/b/a GANG YUE; JOHN  
DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7  
d/b/a GANG TAI WU XIA; and JOHN DOES  
8-10,

Defendants.

Case No.  
**CV 15-1869 MMM (AJWx)**

**DECLARATION OF CARLA  
A. McCAULEY IN SUPPORT  
OF PLAINTIFFS' REQUEST  
FOR ATTORNEYS' FEES RE:  
ORDER GRANTING  
DEFAULT JUDGMENT AS TO  
DEFENDANTS CREATE NEW  
TECHNOLOGY (HK)  
LIMITED AND HUA YANG  
INTERNATIONAL  
TECHNOLOGY LIMITED**

Courtroom: 780  
Judge: Hon. Margaret M.  
Morrow

Complaint Filed: March 13, 2015

1 I, Carla A. McCauley, declare as follows:

2 1. I am licensed to practice law before all the courts in the State of  
3 California and am admitted to the Central District of California and the United States  
4 Court of Appeals for the Ninth Circuit. I am a partner at Davis Wright Tremaine  
5 LLP, counsel for Plaintiffs in the above-entitled matter. I submit this Declaration in  
6 further support of Plaintiffs' request for attorneys' fees made in conjunction with  
7 Plaintiffs' Motion for Default Judgment Against Defendants Create New Technology  
8 (HK) Limited and Hua Yang International Technology Limited (Motion for Default  
9 Judgment). I have personal knowledge of the facts contained herein, and, if called  
10 upon as a witness, I could and would testify competently about these facts, except for  
11 those matters stated expressly upon information and belief, which matters are  
12 believed to be true.

13 2. By Order dated December 7, 2015, the Court granted Plaintiffs' Motion  
14 for Default Judgment. In the Order, the Court directed Plaintiffs to file a declaration  
15 "stating the hourly rates of the attorneys who have worked on this matter and the  
16 number of hours expended litigating matters related to the liability of CNT and  
17 HYIT." *See* Order at 44:5-7.

18 3. Consistent with the Court's Order, I analyzed all of Plaintiffs' invoiced  
19 billing entries to ascertain both the hourly rates and the total invoiced billable hours  
20 and amounts billed to Plaintiffs that related to litigating CNT and HYIT's liability,  
21 consistent with the Court's Order.

22 4. Seven attorneys in the United States and China and two paralegals  
23 assisted on this matter. The billing rate for Rob Balin, a partner in DWT's New York  
24 office, was \$585 per hour for this matter. The billing rate for Rongwai Cai, a partner  
25 in DWT's Shanghai office, was \$580.50 per hour for this matter. The billing rate for  
26 Lacy H. Koonce, a partner in DWT's New York office, was \$495 per hour for this  
27 matter. The billing rate for Carla A. McCauley, a partner in DWT's Los Angeles  
28 office, was \$459 per hour for this matter. The billing rate for Samuel Bayard, an

1 associate in DWT's New York office, was \$459 per hour for this matter. The billing  
2 rate for George Wukoson, an associate in DWT's New York office, was \$414 per  
3 hour for this matter. The billing rate for Alan Huang, an associate in DWT's  
4 Shanghai office, was \$211.50 per hour for this matter. The billing rate for John  
5 Arweiler, a paralegal in DWT's New York office, was \$171 per hour in this matter.  
6 The billing rate for Warren Keville, a paralegal in DWT's Los Angeles office, was  
7 \$139.50 per hour for this matter.

8 5. When totaling all time entries that related to CNT and HYIT's liability  
9 in this action, the total hours billed to Plaintiffs equal 3,217 hours. Plaintiffs have  
10 incurred attorneys' fees of \$1,451,490 for the billed hours associated with CNT and  
11 HYIT's liability.

12 I declare under penalty of perjury under the laws of the United States of  
13 America that the foregoing is true and correct.

14 Executed this 11th day of December, 2015.

15 /s/ Carla A. McCauley  
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17 Carla A. McCauley  
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